

PAUL J. FISHMAN
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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JEFFREY A. MITCHELL,	:	Hon. Robert B. Kugler
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 09-680(RBK)
	:	
UNITED STATES OF AMERICA,	:	
	:	
Defendant.	:	Document Electronically Filed
	:	

NOTICE OF MOTION TO SEAL

To: Catherine L. Sakach, Esq.
Duane Morris, LLP
1940 Route 70 East
Suite 200
Cherry Hill, New Jersey 08003

PLEASE TAKE NOTICE that on August 20, 2012, or as soon as counsel may be heard, the undersigned attorney, on behalf of defendant United States of America will move pursuant to Local Civil Rule 5.3c before the Honorable Karen Williams, United States Magistrate Judge, at the Mitchell H. Cohen Federal Courthouse, One John F. Gerry Plaza, Fourth and Cooper Streets, Camden, New Jersey, for an Order sealing medical records attached at Exhibit C to the Declaration of Donna M. Broome.

In support of this Motion, defendant has submitted the Declaration of J. Andrew Ruymann, dated July 20, 2012, and proposed Findings of Fact, Conclusions of Law and Order.

Defendant respectfully request disposition of this Motion on the papers in accordance with the form of Order submitted herewith.

Respectfully submitted,

PAUL J. FISHMAN
United States Attorney

s/ J. Andrew Ruymann

By: J. ANDREW RUYMANN
Assistant U.S. Attorney

Dated: July 20, 2012